

National Aeronautics and Space Administration

George C. Marshall Space Flight Center

Marshall Space Flight Center, AL 35812

November 1, 2012



Reply to Attn of: LS01(AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Blanket Approval for NASA Employees to Attend a Cocktail Reception and Dinner Sponsored by the North Alabama Chapter of the Federal Bar Association in Honor of the Chief, Command and General Counsels of the Multiple United States Army Redstone Arsenal Commands and NASA Marshall Space Flight Center

This year the North Alabama Chapter (NAC) of the Federal Bar Association (FBA) Fortieth Annual Symposium on Government Acquisition Recent Developments in Government Contracting is scheduled for November 6-8, 2012, at the Huntsville Marriott, Huntsville, AL. The symposium capitalizes on the expertise from renowned private and federal sector attorneys and permits local private and federal sector attorneys and other members of the acquisition community to further develop their technical skills while earning continuing legal and acquisition education credits.

On November 6, 2012, the NAC FBA is hosting a cocktail reception and dinner in Honor of the Chief, Command and General Counsels of the Multiple United States Army Redstone Arsenal Commands and NASA Marshall Space Flight Center at the U.S. Space and Rocket Center Main Museum and Galaxy Dining Room. The reception and dinner is open to FBA members, symposium speakers, private sector attorneys who are admitted to practice law before a federal court, and attorneys employed by local federal government agencies, to include The U.S. Army Materiel Command, The U. S. Army Space and Missile Defense Command, The Missile Defense Agency, The U.S. Army Aviation and Missile Command, The U.S. Army Contracting Command, The U.S. Army Expeditionary Contracting Command, The U. S. Army Corps of Engineers, and The National Aeronautics and Space Administration. It is anticipated that over 60 private and federal sector attorneys will attend the event. The dinner is free to those in attendance. The value of the meal is \$40.00 per person.

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), 14 CFR 1207.103 (c)(4), I have determined that this event will be a widely attended gathering of federal and private sector attorneys, and it is in the best interest of NASA to permit employees who receive invitations to attend the reception and dinner. The event will provide NASA attorneys an opportunity to network with other federal sector attorneys, as well as private sector attorneys, and to discuss current legal issues pertaining to federal procurement.

Each year, the NAC FBA sponsors the Federal Acquisition Symposium and the Federal Labor Law Symposium. Attorneys from the MSFC's Office of Chief Counsel (OCC) typically attend one or both symposia. Funds for such attendance are approved by the Chief Counsel. The total cost to send attorneys to the symposia is only a small part of OCC's annual training budget. While NASA is providing a speaker for the symposium, NASA is not a co-sponsor of the symposium.

Given the purpose of the event, the broad attendance anticipated, and the reasonable market value of this event, I have determined that the value to the agency in having employees attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA invitees, accompanied by a spouse or other guest, may attend this event.

NASA employees whose duties may substantially affect the FBA are not covered in this determination and should seek a specific determination from this office pursuant to 5 CFR 2635.204(g)(3)(i) regarding their participation in this event.

FBA is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act. Therefore, this opinion is applicable to any "Schedule C", non-career appointees who may be invited to the event.

A handwritten signature in black ink, appearing to read "Audrey D. Robinson", followed by a long horizontal line extending to the right.

Audrey D. Robinson
Chief Counsel